



U.S. Department of Justice

Criminal Division

Fraud Section

August 28, 2023

Via FedEx Delivery & Email

Re: **United States v. Constantinescu et al, No. 4:22-CR-00612**

Dear Counsel:

Enclosed please find a flash drive containing a reproduction of emails and their attachments. We have previously produced these materials to you, so the enclosed production does not contain any new material. We are nonetheless reproducing these materials to you in load-ready format at the request of Defendant Hennessey. For security purposes, the password will be provided via e-mail. An index of the production, which indicates the corresponding production in which parent emails and attachments were previously produced, is enclosed.

This flash drive contains files that cover the following Bates ranges:

DOJ-EMAILS-0000000001 - DOJ-EMAILS-0000017578

In this production, the government may have provided, as a courtesy, material which is not discoverable under Rule 16, *Jencks*, *Giglio*, or *Brady*. The fact that certain non-discoverable materials are provided in no way obligates the government to provide all non-discoverable materials, and the fact that certain non-discoverable materials are provided should not be taken as a representation as to the existence or non-existence of any other non-discoverable materials.

By opening this production, you agree that the produced materials are sensitive and confidential, should be used only for purposes of the above-captioned case, and shall not be publicly disclosed unless in a way authorized by the court.

If you have any questions or concerns, please contact me at [REDACTED] or Scott.Armstrong@usdoj.gov.

Sincerely

/s/ Scott Armstrong

Scott Armstrong, Assistant Chief
John Liolos, Trial Attorney